

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

The rejection of claims 1-5 and 7-10 under 35 U.S.C. §103 as allegedly being made "obvious" based on Staples et al. '845 in view of Gruchala et al. '953 is respectfully traversed. The additional three-way rejection of claim 6 under 35 U.S.C. §103 as allegedly being made "obvious" based on Staples/Gruchala in further view of Kahn '438 is also respectfully traversed.

As the Examiner already recognizes, the primary Staples '845 reference is critically deficient. That is, Staples does not teach or suggest translating an actual calling party identity to obtain a corresponding simulated calling line identity. It is precisely because the applicant's invention does translate or map the actual calling party identity to a corresponding simulated calling line identity (CLI) that the called party will receive a consistent calling party line identity so that a missed call can be accurately returned to the actual originating party.

The Examiner relies upon the secondary reference (Gruchala) to allegedly teach this critical deficiency of Staples. However, Gruchala is itself similarly deficient in that it also fails to provide the calling party with a simulated consistent calling line identity permanently associated with the calling party.

Gruchala et al. refer to an individual party's calling line identity being modified to the calling line identity of a group. This would mean that a called party would not be able to respond to the calling party's identity directly, as it would correspond to a plurality of potential destination numbers in practice. As an example, this would mean callers A and B assume group

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identity C according to Gruchala when each calls called party D. If D wishes to return a call to A or B, all they will receive as the calling line identity is C, preventing D from returning the call.

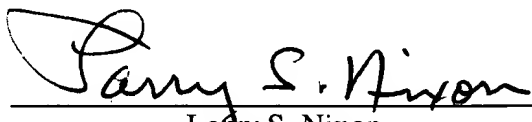
The applicant's invention, in contrast, advantageously maps the calling line identity to a plurality of translation tables, which have the net effect of enabling such return calls to take place. In addition, the invention enables caller A to be at a first location when he/she makes the call to D, and for D to return the call to A when A is at a different location, as the translation tables according to the invention are dynamically updated.

In view of these critical deficiencies of both the primary and secondary references, it is not believed necessary at this time to discuss further deficiencies of these references or of the tertiary reference to Kahn.

Accordingly, this entire application is now believed to be in allowable condition and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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